

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE MIDDLE DISTRICT OF TENNESSEE
3 NASHVILLE DIVISION

3 -----
4 JANE DOE,)
5)
6 Plaintiff,)
7)
8 VS.) NO. 3:20-CV-01023
9) Jury Demand
10 THE METROPOLITAN GOVERNMENT) Judge Trauger
11 OF NASHVILLE AND DAVIDSON) Magistrate Judge
12 COUNTY, TENNESSEE, AND) Holmes
13 DR. ADRIENNE BATTLE,) Lead Case
14)
15 Defendant.)
16 -----)
17 DR. LILY MORENO LEFFLER,)
18)
19 Plaintiff,)
20)
21 VS.)
22)
23 THE METROPOLITAN GOVERNMENT OF)
24 NASHVILLE AND DAVIDSON)
25 COUNTY, TENNESSEE and)
26 DR. ADRIENNE BATTLE,)
27)
28 Defendants.)
29 -----

30 DEPOSITION OF ASHFORD HUGHES
31 Taken on April 11, 2022

<p style="text-align: right;">Page 2 Page</p> <p>1 2 ----- 3 PREPARED BY: 4 CRISTI G. WATSON, LCR Briggs & Associates 5 222 Second Avenue North, Suite 340M Nashville, Tennessee 37201 6 Cristicr@bellsouth.net 615-424-0999 7 8 ----- 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p style="text-align: right;">Page 4 Page</p> <p>1 S T I P U L A T I O N S 2 3 The deposition of ASHFORD HUGHES was taken on 4 the 11th day of April, 2022, by notice, on behalf of 5 the plaintiff, via Zoom, beginning at approximately 6 9:00 a.m. for all purposes allowed under the Tennessee 7 Rules of Civil Procedure. 8 It is agreed that Cristi G. Watson, LCR, may 9 swear the witness, take the deposition by stenographic 10 means and afterwards reduce same to typewritten form. 11 All formalities as to notice, caption, 12 certificate, and signing, et cetera, of the deposition 13 are waived. All objections, except as to the form of 14 the questions, are reserved to the hearing of said 15 matter. 16 17 18 (Unless previously provided, all proper names are 19 spelled phonetically to the best of the court 20 reporter's ability.) 21 22 23 24 25</p>
<p style="text-align: right;">Page 3 Page</p> <p>1 A P P E A R A N C E S 2 3 FOR PLAINTIFFS BAILEY, LEFFLER, MERIWETHER, DOE: 4 Ann Buntin Steiner Attorney at Law 5 Steiner & Steiner, LLC 613 Woodland Street 6 Nashville, Tennessee 37204 Asteiner@steinerandsteiner.com 7 8 FOR PLAINTIFF CATHEY: 9 Jesse Ford Harbison Attorney at Law 10 Jesse Harbison Law, PLLC P.O. Box 68251 11 Nashville, Tennessee 37206 jesse@jesseharbisonlaw.com 12 FOR THE DEFENDANTS: 13 J. Brooks Fox 14 Attorney at Law Metropolitan Courthouse, Suite 108 15 P.O. 196300 Nashville, Tennessee 37219 16 brooks.fox@nashville.gov 17 ----- 18 I N D E X 19 Examination by Ms. Steiner 5 Examination by Ms. Harbison 89 20 Further Examination by Ms. Steiner 93 21 E X H I B I T S 22 Ex. 1 - Application 29 23 Ex. 2 - LinkedIn profile61 Ex. 3 - Record check from criminal court 63 24 Ex. 4 - Resume 89 25</p>	<p style="text-align: right;">Page 5 Page</p> <p>1 ASHFORD HUGHES, 2 having been duly sworn, testified as follows: 3 EXAMINATION 4 BY MS. STEINER: 5 Q. Would you state your full name for the 6 record? 7 A. Ashford Rolland Hughes. 8 Q. Have you ever given a deposition before? 9 A. No, ma'am. 10 Q. Have you ever testified before? 11 A. No, ma'am. 12 Q. Have you ever been involved in a lawsuit 13 before? 14 A. No, ma'am. 15 Q. My name is Ann Steiner. I am the 16 attorney for Jane Doe. We're going to call her Jane 17 Doe. Anytime you see the name -- you hear Jane Doe, it 18 means (name redacted). I also represent Dr. Pippa 19 Meriwether and represent Dr. James Bailey, and I 20 represent Dr. Lily Leffler. Jesse Harbison is on this, 21 too. She represents Dr. Damon Cathey. We represent 22 them all in discrimination retaliation claims against 23 Metro schools. Were you aware of that? Mr. Hughes? 24 (Technical interruption.) 25 THE WITNESS: I think I am frozen. Can</p>

Briggs & Associates 615/482-0037

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1 you hear me now? Let me try another way to get on. 2 One second, please. Are you able to hear me now? 3 MS. STEINER: Yes. 4 Q. Mr. Hughes, I am going to ask you a whole 5 bunch of questions today. Hopefully, it won't be that 6 long. If you don't understand one of my questions, let 7 me know and I will go back and rephrase it for you. 8 Only thing I will stop you for is if you go uh-huh or 9 nod. I will make you say yes or no so the court 10 reporter can take it down and we will have a clear 11 record for trial. Okay? 12 A. Yes, ma'am. 13 Q. Are you married? 14 A. Yes, ma'am. 15 Q. What is your wife's name? 16 A. Her name is Victoria Christiansen Hughes. 17 Q. Where do you live? 18 A. I live at [REDACTED], 19 Circle, Nashville, Tennessee. 20 Q. What is your zip? 21 A. 37214. 22 Q. Do you have any children? 23 A. Yes. 24 Q. How many and what are their ages? 25 A. Two young boys ages three and nine.	1 Q. Did you make the decision to put him 2 there? 3 A. My wife and I made the decision that we 4 would try to get him into Stanford along with several 5 other schools. 6 Q. What were the other schools? 7 A. I do not have that off the top of my head 8 right now. I can ask my wife. 9 Q. Were they Metro schools or private 10 schools? 11 A. Metro schools. 12 Q. To get in to Stanford, did you have to 13 apply to the lottery that you run? 14 A. To get in, yes. At the time I was not in 15 the school right then, but, yes, we did apply through 16 the lottery process. 17 Q. Was Jane Doe running the process then? 18 A. I don't have the answer to that. I am 19 not certain. I am not certain of that answer. 20 Q. When did your child get in Stanford? 21 A. He is in the third grade now. I don't 22 have that correct answer. 2018. 23 Q. Where did he go to grade school? 24 A. He did not -- sorry, repeat the question. 25 Q. Where did he go to first grade?
Page 7 Page	Page 9 Page
1 Q. Nine year old -- where does he go to 2 school? 3 A. Stanford Montessori Elementary School. 4 Q. Is that connected to Metro schools? 5 A. It is. It is a public school. 6 Q. To get in Stanford did you have to go 7 through some sort of lottery? 8 A. Yes, ma'am. 9 Q. Tell me is that the lottery that you run? 10 A. I supervised the team that manages the 11 school options process, yes, ma'am. 12 Q. Is Stanford one of the best in Metro? 13 A. Repeat the question. 14 Q. Is Stanford one of the best montessori 15 schools in Metro Nashville? 16 A. Not certain. If I were to quantify is 17 one school better than the other, it is one of two 18 public montessori schools we do have. 19 Q. What is the other one? 20 A. The other montessori that is public is 21 Hull Jackson. 22 Q. Your nine year old -- did you have to 23 apply through the lottery you run to get him in that 24 school? 25 A. Yes, ma'am.	1 A. Stanford Montessori. 2 Q. Where did he go to kindergarten? 3 A. Stanford Montessori. 4 Q. Did he go to pre-kindergarten? 5 A. He did not. 6 Q. When you applied for kindergarten, he 7 applied for the montessori school, correct? 8 A. Yes, ma'am. 9 Q. How many parents applied for that school? 10 A. I don't have that information in front of 11 me to. 12 Q. Is it a fair statement a lot more apply 13 than actually get in? 14 A. Again, I don't have the information in 15 front of me to say yes or no to that. 16 Q. That's what you run now, correct? 17 A. I supervise the team that manages the 18 school options process and implements. 19 Q. You can't tell me today under oath 20 whether or not more parents apply to get their kids in 21 the montessori schools than actually get in? 22 A. I can't. To give you a just answer on 23 that, no, I -- 24 Q. Is it possible you have empty desks and 25 empty seats in the montessori schools then?

Page 10	Page 12
1 A. Let me make sure I heard that. Is it 2 possible we have empty schools in the montessori 3 schools?	1 Q. Do you know what high school he is zoned 2 for?
4 Q. Or more places for children than you 5 actually have applications?	3 A. I believe again the community we live in 4 I believe is McGavock.
6 A. I think I would need to think about that 7 and look at the process. Stanford and all our schools 8 that are choice options have many families seeking to 9 get entry into them, and it is a school by school basis 10 to understand who is getting in, how many applications 11 are going in, particularly since COVID has passed, so I 12 would need to dig deep to give you a specific answer to 13 that that is factual.	5 Q. Do you know if McGavock is not known as 6 being a good school in terms of preparing the kids for 7 college?
14 Q. Seems like to me you would have more 15 parents applying for the better schools than actually 16 could get in, and you are in charge of that, and you 17 are telling me today under oath you don't know, you 18 have no idea about the application numbers?	8 A. Again, that's an opinion based question. 9 I can't speak to what some people feel is better school 10 or not better school.
19 A. Again, I would push back against the 20 premise, and I know I haven't said Stanford is the 21 better school. I would push back on the premise of any 22 school being better than any one school. I don't have 23 that information.	11 Q. So do you know anything about the testing 12 for these schools and how they do empirically with 13 regard to the SATs, the ACTs compared to each other?
24 We made the decision to send our son 25 where we thought was best for our son, but I cannot	14 A. I cannot. I do not have that information 15 off the top of my head. That's not been a school 16 option question we deal with.
Page 11	17 Q. You and your wife made the decision to 18 put your son in Stanford, as opposed to the grade 19 school that he is zoned for, correct?
1 provide for you right now the specific numbers as to 2 which schools have more kids going in and which others 3 without looking at the information directly in front of 4 me.	20 A. Yes, ma'am.
5 Q. Do you know whether or not montessori 6 schools are known for preparing kids better for high 7 school and college than other schools such as Whites 8 Creek?	21 Q. Tell me why.
9 A. I can't speak to that. Every family 10 makes their own decision.	22 A. We made the decision based off trying to 23 understand what the system was, didn't really 24 understand how to go through the process, and my wife 25 said, hey, these are schools I believe look well to us,
11 Q. So you are in charge of School Choice. 12 You don't know whether or not some of the schools at 13 Metro, such as Whites Creek, Pearl-Cohn versus 14 Hillsboro, Hillwood or montessoris have better scores 15 in general?	Page 13
16 A. I believe the question that you asked me 17 was around which schools are better. I can't answer 18 that question. I don't often, you know, necessarily 19 when I manage the team -- we don't look at scores of 20 the schools. We have families provide choices in which 21 they know are available for them and help them apply.	1 let's try to get him in. I believe that's the process 2 we took.
22 Q. If your child did not go to the 23 montessori school, what school is he zoned for?	3 Q. My question was a little different. You 4 said these are schools that look well to you. Why do 5 they look well to you compared to the school he was 6 zoned for?
24 A. I would need to look at my information. 25 I can't say off the top of my head.	7 A. I would have to reconnect with my wife. 8 She is the main person in our household, and we try to 9 do this together. I think it was just trying to figure 10 out what the system was. We didn't really understand 11 it, so we looked at the options available to us. I 12 have a nephew that went to montessori school in 13 Knoxville and we thought why not give it a try.
	14 Q. You didn't know what the system was; you 15 didn't understand the system when you put your child in 16 that school, correct?
	17 A. We did not know how to go through the 18 process of identifying which schools we wanted our kids 19 to go to because we were first time parents going 20 through the process. We asked friends and went in and 21 tried to research ourselves as we were trying to decide 22 which school we wanted to send our child to.
	23 Q. Isn't it true you identified the schools 24 you thought would give your child a better education?
	25 A. Isn't it true -- repeat the question one

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1 more time.	1 for diversity -- for the Executive Officer for Diversity, Equity, and Inclusion.
2 Q. Isn't it true you and your wife attempted 3 to identify the schools that would give your child the 4 better education?	3 Q. How did you know that job position was 4 open?
5 A. I think we wanted to find a school that 6 we were comfortable with that we thought would best 7 benefit our son, and we tried to figure out what that 8 looks like for us being new parents to this. So I 9 can't exactly say what our full methodology was, but we 10 were learning and we were new, and this was the choice 11 we chose or were able to choose.	5 A. I believe several months before I came on 6 as I was transitioning from another job, I was asked 7 would I be interested in interviewing for the position.
12 Q. Do you know any more about the procedure 13 at Metro schools and how to place your child in a Metro 14 school today as of today's date?	8 Q. Who asked you that?
15 A. Do I know more now? (Audio distortion.)	9 A. I believe I had a meeting in mid April, 10 early April with Mr. Hank Clay.
16 Q. You went out for a second.	11 Q. Was that the first you knew that there 12 was going to be an opening?
17 A. I said, yes, I do know more now.	13 A. Yes, ma'am.
18 Q. How do you know more now?	14 Q. Did he ask you to come in for an 15 interview, for a meeting, or was it -- where did the 16 meeting take place?
19 A. Because first I manage school options 20 team now, and I've had to do research and understand 21 that process. I have had to help some families walk 22 through that process themselves, so obviously going on 23 the time I have been here now supervising that team, I 24 have been able to really understand more about the 25 process, the system, and everything that goes on.	17 A. I do not remember off the top. It may 18 have been -- I don't want to speculate. I do not 19 recall off the top of my head. Might have been a phone 20 call, but I was on the road at the time working with 21 Michael Bloomberg at the time, so I do not recall where 22 it was at specifically as of right now.
Page 15	23 Q. So it was a phone call and you were out 24 of town, correct?
1 Q. Before you took the job as Executive 2 Officer of Diversity, Equity and Inclusion, did you 3 have any knowledge about how that job was run in terms 4 of School Choice?	25 A. I can't say that. I don't remember. I
5 A. Let me make sure. Did I have any 6 understanding how the job of chief of Diversity, 7 Equity, and Inclusion officer was run or the office of 8 School Choice?	Page 17
9 Q. Officer of School Choice.	1 I don't recall right now where we met, if we met in 2 person or not right now. It's been some time ago.
10 A. Up until that time I did not.	3 Q. Why did you have this contact with Hank 4 Clay?
11 Q. Did you know you were going to be given 12 School Choice when you were hired on as executive 13 officer of diversity, inclusion -- and what was the 14 other term?	5 A. As I said he asked what was I working on 6 right now, would I be interested in applying for the 7 position that might be upcoming.
15 A. Diversity, Equity, and Inclusion.	8 Q. What did you tell him?
16 Q. Did you know you would be given the 17 School Choice when you took that job?	9 A. If I recall, I told him what I was 10 working on right then and that I would be interested.
18 A. At the onset in the first interview I did 19 not know.	11 Q. What did you tell him you were working on 12 right then?
20 Q. When you went in to interview for the 21 School Choice job, how did you know there was going to 22 be an opening?	13 A. Just with Michael Bloomberg at the time.
23 A. I fall back on the premise I did not take 24 an interview for specifically the School Choice. I 25 took an interview to apply for -- to come for the job	14 Q. What did you tell him about Michael 15 Bloomberg?
	16 A. I don't recall.
	17 Q. Did he ask you any questions about your 18 background?
	19 A. Yes, ma'am.
	20 Q. In that phone call?
	21 A. Again, I hate to speculate if it was a 22 phone call. I just don't remember the term of 23 communication at this time.
	24 Q. How long did you speak with Mr. Clay in 25 this mid-April 2020 meeting?

<p style="text-align: right;">Page 18</p> <p>1 A. I don't recall. Most of the time -- I 2 can't give you an honest number, timeline right now. 3 Q. What did you do for Michael Bloomberg? 4 A. For several months I served within his 5 team within our state team. We did some national work 6 around DE&I space cultivating leadership within black 7 and brown communities and doing a lot of political 8 organizing across the state and in some of the southern 9 areas.</p> <p>10 Q. Were you paid for that job? 11 A. Yes, ma'am. 12 Q. What were you paid? 13 A. I would have to go through my tax records 14 to say what the full contract was. 15 Q. I want to know approximate. 16 A. Okay. Again, it's been a while. I don't 17 have the full approximate. I would have to go back and 18 look through my contract I had with them. 19 Q. Was it a part-time job or full-time job? 20 A. It was my full-time. It was full-time 21 contractual. 22 Q. And how many hours a week did you work 23 for Bloomberg and when did you start working for 24 Bloomberg? 25 A. I believe I started working for Bloomberg</p>	<p style="text-align: right;">Page 20</p> <p>1 Q. Could it have been a thousand dollars an 2 hour? 3 A. I can't give you an honest answer without 4 looking at my records to assess. 5 Q. Could it have been 2000 an hour? 6 A. Again, I would have to look at my 7 records. It's been almost two-plus years. I would 8 need to look at the records to see what that contract 9 was with the Bloomberg team. 10 Q. Did you work anywhere else from October 11 2019 until you went to work for Metro schools? 12 A. I cannot say that I did. 13 Q. You can answer anything as long as it's 14 truthful. 15 A. Exactly. I cannot say that I did work 16 for anybody in between that time that I was on a paid 17 contract for. 18 Q. Who did you work for? 19 A. As I said earlier, Michael Bloomberg. 20 Q. Anybody else? 21 A. I cannot recall right now anybody else 22 that I would have worked for in between the time that I 23 was under contract for. 24 Q. Did you know Hank Clay before you came in 25 for the interview?</p>
<p style="text-align: right;">Page 19</p> <p>1 November or October of 2019, and I can't recall exactly 2 how many hours a week I was working. I would have to 3 again look at my contract. I believe it might have 4 been 30 or 40 hours a week, but I had a contract with 5 them I was working. I would have to go back and look 6 for that information.</p> <p>7 Q. Paid by salary or hourly? 8 A. I was paid via contract. 9 Q. Was it an hourly rate or a salary rate? 10 A. It was an hourly rate. 11 Q. What was your hourly rate? 12 A. Again, I need to go back and look at the 13 contract. I can't recall. 14 Q. Was it \$500 an hour? Was it \$100 an 15 hour? Was it \$20 an hour? Do you have any idea? 16 A. I just don't remember. 17 Q. You don't know if it was \$500 an hour or 18 \$15 an hour? 19 A. I don't, ma'am. I would need to look at 20 my records just to verify to give you an honest 21 assessment. 22 Q. You possibly could have made \$500 an hour 23 working for Mr. Bloomberg? 24 A. I can't give you an honest assessment on 25 that to answer the question the way you asked it.</p>	<p style="text-align: right;">Page 21</p> <p>1 A. I did. 2 Q. How did you know him? 3 A. I have known him for -- in years past 4 through mutual friends, through political politics. 5 Q. You knew him politically, correct? 6 A. Yes. 7 Q. You are both members of the democratic 8 party? 9 A. Yes, I am. I am a member of the 10 democratic party. I cannot speak to what Hank Clay is 11 a member of at this time. 12 Q. Did you know that he is a democrat? 13 A. When we met I believe we met in 14 democratic circles, but, again, I am speaking -- you 15 asked me a question. I am speaking to what Ashford is 16 100 percent aware of. I can't say Hank Clay is still 17 with the democratic party. I don't know. We met years 18 ago in democratic political circles. 19 Q. When you were hired to work for Metro 20 schools as an executive officer, was Hank Clay still 21 actively involved in the democratic party? 22 A. I can't answer that question. That would 23 be a question Hank Clay would have to answer. 24 Q. You don't know that? 25 A. I do not know. I cannot speak to Hank</p>

<p style="text-align: right;">Page 22</p> <p>1 Clay what he is part of outside of the professional 2 realm.</p> <p>3 Q. How many interviews did you have for the 4 job?</p> <p>5 A. Off the top of my head, I am thinking I 6 would need to go back through my calendar. At least 7 three interviews.</p> <p>8 Q. Who were they with?</p> <p>9 A. I know the chief of HR at the time, the 10 chief of schools of innovation at the time. There were 11 I believe a couple of other people, but I can't recite 12 who all those individuals were at this time. I know 13 those stuck out.</p> <p>14 Q. Who was the chief of HR?</p> <p>15 A. Mr. Chris Barnes.</p> <p>16 Q. Who was the chief of schools innovations?</p> <p>17 A. Dr. Sharon Griffin.</p> <p>18 Q. Do you recall interviewing with Hank 19 Clay?</p> <p>20 A. Yes. He was on (audio distortion) -- I'm 21 sorry.</p> <p>22 Q. Do you recall interviewing with Hank 23 Clay?</p> <p>24 A. Yes. He was on a couple of the latter 25 end interviews I did.</p>	<p style="text-align: right;">Page 24</p> <p>1 A. I believe, as I said in my earlier 2 testimony, the first interview that I had with -- I 3 don't believe -- I can't recall off the top of my head 4 if Hank was there. I know those two individuals and 5 two others. I know in the latter interviews Mr. Clay 6 was a part of the interview process.</p> <p>7 Q. Now, it sounds like you had several 8 interviews that started out solely with Chris Barnes, 9 Sharon Griffin to begin with and then turned into a 10 group interview with all three, Griffin, Barnes and 11 Clay? Is that what you are saying?</p> <p>12 A. I believe -- as I said earlier, there 13 were multiple besides Mr. Barnes and Ms. Griffin on my 14 very first interview I believe, and then leading up to 15 the final interviews it was -- I don't recall if it was 16 at the end one person or two people on there. I would 17 need to go back and look at my calendar to verify. 18 There has been a lot since then that's taken place. I 19 can't specifically give you minute details of the who, 20 when, and where for all of those details.</p> <p>21 Q. Do you know if anyone else who applied 22 for that job was interviewed by a panel other than you?</p> <p>23 A. I don't know. I can't speak to that. 24 I can't speak to their methodology.</p> <p>25 Q. Did you know Hank Clay testified he was</p>
<p style="text-align: right;">Page 23</p> <p>1 Q. You got me a little confused because Hank 2 Clay said he is the only one that interviewed you.</p> <p>3 A. Hmm.</p> <p>4 Q. You are saying you literally went in for 5 an interview with Chris Barnes, you went in for Sharon 6 Griffin?</p> <p>7 A. I did not. I remember the interviews I 8 had before. Scope of interviews I had included those 9 individuals.</p> <p>10 Q. So when you came in to interview for 11 Metro schools, you had an interview with Chris Barnes, 12 an interview with Sharon Griffin, and an interview with 13 Hank Clay?</p> <p>14 A. No. What I am telling you is that over a 15 period of time I had an interview with a panel of 16 people, Chris Barnes, Dr. Sharon Griffin, and I think 17 there were maybe two other people on there. I don't 18 remember those faces or those names right now, but it 19 was a panel that I went through.</p> <p>20 Q. Did you interview solely with Hank Clay?</p> <p>21 A. I don't believe so. I can't recall off 22 the top of my head.</p> <p>23 Q. You went to a panel interview that had -- 24 correct me if I am wrong -- Chris Barnes, Sharon 25 Griffin, Hank Clay on the panel?</p>	<p style="text-align: right;">Page 25</p> <p>1 the only one to interview you?</p> <p>2 A. I can't speak to that.</p> <p>3 Q. I want to talk about how the interview 4 occurred. Was it live or by Zoom or telephone or some 5 other method?</p> <p>6 A. By Zoom.</p> <p>7 Q. So do you know if it was recorded?</p> <p>8 A. I can't remember.</p> <p>9 Q. Do you know the date of your first 10 interview?</p> <p>11 A. I can't remember.</p> <p>12 Q. Do you know the date of your second 13 interview and how it was done?</p> <p>14 A. Again, I don't remember off the top of my 15 head. It was something I would have to dig deep into 16 my calendar to find.</p> <p>17 Q. Do you know the date of your third 18 interview?</p> <p>19 A. I do not have that in front of me, no, 20 ma'am.</p> <p>21 Q. Under oath today isn't it true you really 22 weren't interviewed?</p> <p>23 A. I would definitely push back against that 24 and say that is absolutely false. I was interviewed, 25 multiple interviews.</p>

		Page 26	Page 28		
1	Q.	Did you fill out an application?	1	Q.	See that?
2	A.	Absolutely.	2	A.	I do now.
3	Q.	Was it filled out on line?	3	Q.	A lot of this is May 5, the date you
4	A.	The application was filled out on line.	4	applied.	
5	Q.	Did Mr. Clay tell you why he wanted you	5	A.	Okay.
6	to apply for this position?		6	Q.	Says you applied on line. They sent you
7	A.	He did not that I recall.	7	correspondence. Then a recruiter reviewed your	
8	Q.	I am going to share a screen with you	8	process. Status changed to under consideration and	
9	hopefully. Can you see this screen?		9	step manager review. See that May 27, 2020?	
10	A.	I can.	10	A.	Yes, ma'am.
11	Q.	Good. Let's go up to the top and go	11	Q.	Know what that means?
12	13	through this and ask if you recognize this. This was	12	A.	Say that again.
14	produced to me by Metro schools. You see at the bottom		13	Q.	It says May 27, 2020, status changed to
15	16	of the page where it says MG000183?	14	under consideration. Do you see that?	
17	A.	Yes, ma'am.	15	A.	I do.
18	Q.	I want to ask you questions about this.	16	Q.	Then it goes to May 27 at 2:40 p.m. at
19	Says at the top Ashford R. Hughes applied for job of		17	the top. Says moved to step offer. Does that sound	
20	Executive Officer of Diversity, Equity, and Inclusion,		18	like approximately the date you were offered the job?	
21	22	correct?	19	A.	I can't say yes or no. I don't have
23	A.	Yes, ma'am.	20	recolleciton.	
24	Q.	Let's go down to the very bottom. These	21	Q.	May 28 they did a pre-employment
25	26	are all numbered in line, and the last one is MG000202,	22	screening on you. Then May 28 says candidate accepted;	
27	correct?		23	you accepted the offer. See that?	
28	A.	Yes, ma'am.	24	A.	I do.
29	Q.	Does this look like the information you	25	Q.	Do you know what's missing from here, Mr.
		Page 27	Page 29		
1	filled out on line to apply for this job?		1 Hughes?		
2	A.	Without seeing it really in front of me,	2 A.	I am listening.	
3	that looks like -- I can't recall because I don't know		3 Q.	Do you know what's missing from here?	
4	exactly where you are pulling it from or what all you		4 A.	Are you looking for an answer from me?	
5	are getting ready to show me, so I can't yes or no		5 Q.	Yes. Do you see anything missing from	
6	unless I put on my glasses.		6 this? They kept track of everything that happened with		
7	Q.	Put on your glasses. I am moving this up	7 your application. I want to know if you know that it		
8	and down. Stop me if you want me to and tell me		8 doesn't have any interview dates on here?		
9	there's something else --		9 A.	I can't speculate to any of that or why	
10	A.	Repeat the question.	10 or why not. I don't have any answer for you for that.		
11	Q.	Does this look like the information that	11 Q.	Let's have this marked Exhibit No. 1 to	
12	13	you provided to Metro schools?	12 your deposition today. While the court reporter is		
14	A.	Possibly so.	13 marking it, I will ask some questions about it.		
15	Q.	I want to ask you, this supposedly has in	14 A.	Could you say the last part? You went	
16	17	15 everything that occurred. See May 5th, 2021, it	15 out on my end.		
18	says application process starts. Does that sound about		16 Q.	I want this marked as an exhibit to your	
19	17 like the date that you filed?		17 deposition today. The court reporter is marking it		
20	A.	I can't recall. If that's time stamped,	18 Exhibit No. 1 so we know what it is that I have spoken		
21	19 then that's the time stamp, but I can't recall.		19 with you about.		
22	Q.	Do you see where it says events on the	20 A.	Okay.	
23	24	21 side?	21 MR. FOX: No objection.		
25	A.	Where it says events?	22 (Exhibit No. 1 was marked.)		
26	Q.	Yes, events on the second column over.	23 BY MS. STEINER:		
27	28	24 It has dates, events, details?	24 Q.	Mr. Hughes, where are you from?	
29	A.	Okay.	25 A.	Knoxville.	

	Page 30		Page 32
1	Q. Where did you go to high school?	1 period of time you did not attend TSU?	
2	A. I went to Carter High School.	2 A. If I am thinking right, I believe so.	
3	Q. Is that a public school there?	3 Q. What years?	
4	A. It is a public school.	4 A. I don't have that in front of me. I	
5	Q. What year did you graduate from high	5 would have to again go back 20-something years ago. I	
6	school?	6 would have to dig deep to get all that information.	
7	A. 1997.	7 Q. Was there any probation?	
8	Q. Where did you go to college?	8 A. Not necessarily because of probation,	
9	A. Tennessee State University.	9 just some things I was going through at the time as	
10	Q. What years did you attend TSU?	10 well.	
11	A. 1997 until 2005 and undergrad.	11 Q. What things were you going through at the	
12	Q. Flunk any courses there?	12 time?	
13	A. I did.	13 A. My best friend was killed by gun violence	
14	Q. What did you flunk?	14 in Knoxville, and I had another friend killed by gun	
15	A. I can't recall off the top of my head. I	15 violence around eight months later.	
16	would need to look at my transcripts.	16 Q. Who was your best friend? What was his	
17	Q. Were you kicked out a few semesters?	17 name? I am sorry I have to ask.	
18	A. Was I kicked -- I don't believe I was	18 A. My best friend's name was James Evans,	
19	kicked out any semesters, no, ma'am.	19 Jr.	
20	Q. When you flunked the courses, did you	20 Q. Who else died from gun violence?	
21	have to go back in and retake them?	21 A. My other friend's name was Tony Curtis.	
22	A. Some I did, yes, ma'am.	22 Q. Was it separate incidents where they were	
23	Q. Do you recall how many you actually	23 killed?	
24	flunked?	24 A. Yes, ma'am.	
25	A. I don't recall off the top of my head.	25 Q. In Knoxville?	
	Page 31		Page 33
1	Q. Were you ever put on administrative	1 A. Yes, ma'am.	
2	leave, or whatever they call it at TSU, because of	2 Q. What year was Mr. Evans killed?	
3	3 grades?	3 A. Latter 1998.	
4	A. I was never put on leave. I believe -- I	4 Q. What year was Tony Curtis killed?	
5	5 may stand corrected -- I may have been put on	5 A. I want to say '99.	
6	probation, but I was never on leave.	6 Q. Was it gang related?	
7	Q. What does probation at TSU mean?	7 A. It was not.	
8	A. I can't recall that now. I don't know.	8 Q. It was just a fluke?	
9	9 I would have to look at the specific language of that.	9 A. I guess if you want to call it a fluke.	
10	10 It's been decades, so I don't know, to be honest.	10 My friend Tony Curtis was killed over an argument about	
11	11 Q. What years were you put on probation?	11 a young lady. My best friend was killed in an	
12	12 A. I don't remember. I don't have that	12 attempted robbery.	
13	13 information in front of me.	13 Q. Was your friend being robbed?	
14	14 Q. Was it more than -- is TSU on quarter or	14 A. My friend was one of several that were	
15	15 semester system?	15 being robbed at the time. He unfortunately ran the	
16	16 A. I believe on the semester.	16 wrong way.	
17	17 Q. How many semesters were you on probation?	17 Q. Did they catch the robbers?	
18	18 A. I don't recall.	18 A. They have not.	
19	19 Q. Does probation mean you can still attend	19 Q. So your friend James Evans, Jr. was	
20	20 school, but if you don't do well, they will put you out	20 somewhere where he and several others were robbed at	
21	21 of school for a bit of time?	21 gunpoint?	
22	22 A. I don't have the full definitive	22 A. Yes, ma'am.	
23	23 information on that. It was a red flag for me that I	23 Q. In Knoxville?	
24	24 needed to get my academics in order.	24 A. Yes, ma'am.	
25	25 Q. From 1997 to 2005, was there any extended	25 Q. Where were they in Knoxville when they	

<p style="text-align: right;">Page 34</p> <p>1 were robbed at gunpoint?</p> <p>2 A. In the backyard of one of our friend's 3 homes.</p> <p>4 Q. Did it have anything to do with drugs or 5 any other sort of violence?</p> <p>6 A. It did not.</p> <p>7 Q. Why did they come in the backyard of a 8 home to rob people?</p> <p>9 A. I can't answer that question. I wish I 10 knew, but I don't have the answer to that question. I 11 wish I knew so he would still be alive today.</p> <p>12 Q. It is my understanding that you carried a 13 gun, correct?</p> <p>14 A. There was one point in time after his 15 death I did carry a gun, yes, ma'am.</p> <p>16 Q. The questions I have asked you about 17 today about TSU and whether or not you flunked a course 18 at TSU and about the guns, did anyone at Metro schools 19 ask you these questions in your interview?</p> <p>20 A. I want to go back and say there was not 21 guns with an S. There was one gun that I had. 22 Everything that was in my -- that I was asked to put in 23 any type of resume -- I put in multiple resumes -- 24 always includes my background.</p> <p>25 Q. The question is different. Did anyone at</p>	<p style="text-align: right;">Page 36</p> <p>1 Q. Who did you buy it from?</p> <p>2 A. At a gun sale thing in Knoxville. Not a 3 gun sale thing, but one of the gun shows.</p> <p>4 Q. How old were you when you bought it?</p> <p>5 A. I think I was 19 or 20 maybe. I don't 6 recall.</p> <p>7 Q. Did you have any other guns besides the 8 nine millimeter?</p> <p>9 A. No, ma'am.</p> <p>10 Q. Did you have it registered in your name?</p> <p>11 A. I don't remember.</p> <p>12 Q. Were you charged with some sort of a 13 criminal violation with regard to that gun?</p> <p>14 A. Yes, ma'am.</p> <p>15 Q. What were you charged with?</p> <p>16 A. Possession of a weapon.</p> <p>17 Q. Where were you when you were charged with 18 this?</p> <p>19 A. In Nashville.</p> <p>20 Q. How old were you when you were charged 21 with this?</p> <p>22 A. I don't recall. Nineteen or 20, maybe 20 23 at the time.</p> <p>24 Q. Did anyone from Metro schools question 25 you at all about -- did you plead guilty to the</p>
<p style="text-align: right;">Page 35</p> <p>1 Metro schools ask you questions about TSU and your 2 grades there or whether or not you flunked a class or 3 were put on probation?</p> <p>4 A. Not that I recall.</p> <p>5 Q. If they had asked you that, would you 6 have told them exactly what you just told me?</p> <p>7 A. As far as my recollection, I would be 8 honest with them, and if I needed to go back and get 9 further information, then I would have gone back and 10 gotten further information.</p> <p>11 Q. You were charged with carrying a weapon, 12 correct?</p> <p>13 A. Yes, ma'am.</p> <p>14 Q. Was it registered?</p> <p>15 A. Yes, ma'am.</p> <p>16 Q. Who was it registered to?</p> <p>17 A. If I recall right, again -- I can't even 18 recall.</p> <p>19 Q. What type of weapon was it?</p> <p>20 A. I believe it was a nine millimeter.</p> <p>21 Q. Is that a gun, nine millimeter gun?</p> <p>22 A. I believe that's the caliber of a gun, 23 yes, ma'am.</p> <p>24 Q. Who owned the gun?</p> <p>25 A. I actually purchased the gun.</p>	<p style="text-align: right;">Page 37</p> <p>1 possession of the gun?</p> <p>2 A. I believe so.</p> <p>3 Q. Did anyone at Metro schools ask you at 4 all about that conviction?</p> <p>5 A. I don't recall.</p> <p>6 Q. Was it Metro police or TSU police? Who 7 actually arrested you for that?</p> <p>8 A. I believe Metro police.</p> <p>9 Q. What caused them to arrest you for the 10 possession of a weapon?</p> <p>11 A. I can't speak solely for the police. We 12 were pulled over because they said I had a broken 13 taillight. So this goes to the broken taillight police 14 theory that was in place for several decades that is 15 now no longer there, and upon pulling us over and 16 checking for my license and registration, they said I 17 had a gun underneath the seat. Then it escalated from 18 there.</p> <p>19 Q. They searched the vehicle then?</p> <p>20 A. Yes, ma'am.</p> <p>21 Q. You pled guilty to possession of a 22 weapon?</p> <p>23 A. Yes, ma'am. If I am thinking about my 24 records right, yes, ma'am.</p> <p>25 Q. They pulled you over for broken</p>

Page 38	Page 40
1 taillight. Did they charge you with anything else?	1 looked at them for some time, to be honest.
2 A. I can't recall.	2 Q. Did you go to jail?
3 Q. Had you ever been charged criminally	3 A. I did.
4 before?	4 Q. How much time did you have to stay in
5 A. Yes, ma'am.	5 jail?
6 Q. For what?	6 A. A couple of hours until I had my friends
7 A. I have two other charges. One is a DUI	7 bond me out.
8 and the other is possession of marijuana.	8 Q. For the DUI that you had in 2005, 2006,
9 Q. Do you have any criminal charges out of	9 did you have to go to jail?
10 Knox County?	10 A. I believe I did just that day until I
11 A. I do not.	11 bonded out or may have been I had to do another 24
12 Q. Do you have any other criminal charges	12 hours at some point in time after that. I don't fully
13 other than the two DUIs and the possession?	13 remember.
14 A. Not that I recall.	14 Q. I want to ask you about some of the
15 Q. Could you tell me the circumstances of	15 things you put for personal information. This has your
16 the DUIs?	16 address on here, this [REDACTED], correct?
17 A. The DUI, not DUIs. Driving while	17 A. Yes, ma'am.
18 drinking. I want to say 2005 or 2006 I have a DUI	18 Q. Is that what you would have put into the
19 where I got into a wreck after having too much to	19 computer?
20 drink.	20 A. Yes, ma'am.
21 Q. So you hit another vehicle?	21 Q. It has your cell phone. Is that your
22 A. Yes, ma'am.	22 home phone or cell phone?
23 Q. How much damage was done to the other	23 A. That's my cell.
24 vehicle?	24 Q. Is that your e-mail?
25 A. I can't recall.	25 A. Yes, ma'am.
Page 39	Page 41
1 Q. Did you total it?	1 Q. That's your driver's license?
2 A. I can't recall.	2 A. Yes, ma'am.
3 Q. Was there a lawsuit?	3 Q. Says have you been convicted of any
4 A. No, ma'am.	4 traffic or moving violations. You said, yes, correct?
5 Q. Do you know what you registered on the	5 A. Yes, ma'am.
6 DUI machine?	6 Q. You put down a DUI in Davidson County,
7 A. I can't recall.	7 and that is the one that resulted in the wreck,
8 Q. You have only been charged one time with	8 correct?
9 DUI and that was 2005 or 2006?	9 A. Yes, ma'am.
10 A. As far as driving under the influence of	10 Q. Where were you when the wreck occurred?
11 alcohol, yes. I believe -- I guess my possession of	11 A. I believe headed near the airport, so
12 marijuana was a DUI. I don't have my paperwork in	12 that strip of highway I believe near the airport.
13 front of me, but I know there was another charge I had	13 Q. I-40 you mean?
14 that was associated with marijuana.	14 A. Yeah.
15 Q. Were you under the influence when you	15 Q. You were on I-40 going to the airport
16 were charged with possession of marijuana?	16 when you were pulled over for DUI when you had the
17 A. At the time I was not.	17 wreck?
18 Q. Were you charged with DUI at the time you	18 A. I don't believe I was going to the
19 were in possession of marijuana?	19 airport but going that direction, going back home where
20 A. I don't remember what I was specifically	20 I lived at the time.
21 charged with, but I do remember that the officer said	21 Q. Were you picked up by Tennessee Highway
22 that he smelled marijuana and that he was going to -- I	22 Patrol?
23 can't remember how he phrased it, but I would be going	23 A. I do not believe so, but I cannot answer
24 to jail because of that. I don't have all of my exact	24 that. It was Metro police department.
25 records in front of me to tell you verbatim. I haven't	25 Q. Was anybody hurt in the vehicle that you

<p style="text-align: right;">Page 42</p> <p>1 hit?</p> <p>2 A. Not that I can recall off the top of my head.</p> <p>3 Q. How did you hit the other vehicle?</p> <p>4 A. I don't recall.</p> <p>5 Q. Do you recall if you ran into the back, ran into the side, ran into the front of the other vehicle?</p> <p>6 A. I don't recall.</p> <p>7 Q. Do you recall how many vehicles were involved in the accident?</p> <p>8 A. If I am remembering my report right, it was just myself and this other vehicle.</p> <p>9 Q. Did you have insurance when this occurred?</p> <p>10 A. Yes, ma'am.</p> <p>11 Q. Did the claim go over your policy limits?</p> <p>12 A. I don't recall.</p> <p>13 Q. Did you have to hire a lawyer to help you?</p> <p>14 A. I know I didn't have the money for a lawyer. Probably had a public defender.</p> <p>15 Q. Did anyone from Metro schools ask you any questions about the 2006 DUI or the 2004 speeding with marijuana possession?</p>	<p style="text-align: right;">Page 44</p> <p>1 A. I do not believe so. I can't recall.</p> <p>2 Q. If anyone had asked you questions about your criminal record, whether it be DUI, marijuana possession, or misdemeanor possession of a registered weapon, would you have been honest and told them?</p> <p>3 A. Absolutely. If I had to do it, yes, I would have absolutely told them. I don't know if I did 8 or didn't or had the conversation, but I never hide my background.</p> <p>4 Q. Do you recall -- I need specifics here. Do you recall anybody at Metro schools asking you any question about that saying what's going on with these criminal charges against you?</p> <p>5 A. I do not recall.</p> <p>6 Q. I am going to ask you something else that was on here. It asked for your educational. You put down Tennessee State University. Did anyone ask you what year you got out of high school and why it took you that extra time to get your bachelor's degree?</p> <p>7 A. I don't recall. These conversations were over two years ago. I don't recall all the ins and outs of what was particularly asked at the time to be honest with you.</p> <p>8 Q. You see your GPA 2.5 out of 4?</p> <p>9 A. Yes.</p>
<p style="text-align: right;">Page 43</p> <p>1 A. I don't recall. I don't.</p> <p>2 Q. Let's go down a little farther.</p> <p>3 Convicted of a felony or misdemeanor in this state or any other? You said, yes. You said 1999 misdemeanor, possession of registered weapon.</p> <p>4 A. Yes.</p> <p>5 Q. Does that mean the weapon was registered or wasn't registered?</p> <p>6 A. It says there registered, so I am going with it means it was registered.</p> <p>7 Q. You wrote this, correct?</p> <p>8 A. Yes.</p> <p>9 Q. This is your application, correct?</p> <p>10 A. Yes. I believe that's typing it directly from the information as I was going through whatever my record was at the time, so, yes.</p> <p>11 Q. Do you have any criminal charges filed against you in any other state in the United States?</p> <p>12 A. I do not.</p> <p>13 Q. Do you realize that the DUI is also and the marijuana possession are also criminal offenses?</p> <p>14 A. Yes.</p> <p>15 Q. Did anyone at Metro schools ask you any questions about the misdemeanor possession of a registered weapon?</p>	<p style="text-align: right;">Page 45</p> <p>1 Q. What does that correspond to at TSU?</p> <p>2 A. I would have to go back through and look at that information. I don't recall.</p> <p>3 Q. You know that a four corresponds to an A, doesn't it?</p> <p>4 A. I believe so, but I would need to go back to TSU and get that information.</p> <p>5 Q. You know that a three corresponds to a B?</p> <p>6 A. I would have to have -- I don't want to say yes and I'm not factually correct. I would need to go back to TSU to verify those metrics to look it up.</p> <p>7 Q. You are in education right now. It seems to me that you would know what a 4.0 is, but you are telling me today under oath you don't?</p> <p>8 A. Before I make any statement, I would like to have the information in front of me so I can make a factual statement before I just say yes because I think it could be. I want to make certain it actually is. I haven't been in followup with TSU as of recently to figure out their grading scale or what everything is going on. I would need to get that to make a factual statement as I am under oath.</p> <p>9 Q. Are you aware most of the universities use the same grading system where 4.0 is an A?</p> <p>10 A. Again, I am not involved in a lot of</p>

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1 other higher institutions. So, again, I could say yes 2 to say yes, but I want to be factual just to make 3 certain I am factual for my own invocation and giving 4 correct information while I'm under oath.	1 little later. I would have to go back in and think 2 about it.
5 Q. What was your grade point average when at 6 TSU?	3 Q. What did you do for Carrabba's? 4 A. I was a server.
7 A. I would have to go back through and look 8 up all the cumulative and make certain, but, as you see 9 right there, I put 2.5, so that must have been the 10 information as I received it and put it into my report.	5 Q. Then after you left -- how long did you 6 work for Carrabba's?
11 Q. Do you know what 2.5 corresponds to?	7 A. I don't recall. Couple of years maybe. 8 Q. Would that get you through -- assuming 9 you got out of TSU in 2006, does that get you through 10 about 2008?
12 A. Again, as I said earlier, I can't speak 13 to that right now, but I am sure -- seems like you are 14 going to tell me or provide insight.	11 A. I left TSU in 2005. At the same time I 12 was interning with Harold Ford, Jr. working at the 13 state parties doing some stuff. I can't recall all the 14 things that I was doing in between 2005 to 2008 with 15 some of the main jobs and other jobs I had.
15 MR. FOX: Object to the form.	16 Q. You had multiple jobs?
16 BY MS. STEINER:	17 A. Yes, ma'am.
17 Q. Do you recall ever telling anybody that 18 you had a Ph.D.?	18 Q. When you left Harold Ford, Jr.'s, 19 campaign, where did you go?
19 A. Say that again.	20 A. I would have to look at all my resumes to 21 figure that out. I can't recall off the top of my 22 head.
20 Q. Do you recall ever telling anybody that 21 you had a Ph.D.?	23 Q. How did you come about being hired on at 24 Megan Barry's.
22 A. Never, because I do not have a Ph.D.	25 A. Did you say how did I come about being
23 Q. Did you ever tell anybody you had a 24 master's?	
25 A. A bachelor's.	
Page 47	Page 49
1 Q. Master's degree?	1 hired?
2 A. No, ma'am, because I do not have a 3 master's degree.	2 Q. Yes.
4 Q. Have you ever been fired from a job?	3 A. Hired or fired?
5 A. Not that I can recall.	4 Q. Hired.
6 Q. Have you ever been suspended or put on 7 probation at a job?	5 A. Hired. So coming from 2010, I was the 6 political director, as well as field director for 7 congressional campaign in South Carolina and had been 8 working on that one for about a year. Prior to that I 9 had been working at the state democratic party off and 10 on some time working in different community factions.
8 A. Not that I can recall.	11 Megan contacted me as I was working in Virginia at the 12 time on a campaign, would I be interested in coming 13 back and managing her re-election campaign at large.
9 Q. When you first got out of TSU, where did 10 you work?	14 Q. Did you do that?
11 A. I mean there are several jobs that I had 12 -- RPS. I worked at Ruby Tuesday for a while. I 13 worked at Carrabba's at some point in time. I worked at 14 during that time some for Harold Ford, Jr. I worked at 15 some point under his campaign. I worked for the 16 Tennessee democratic party at points in time right out 17 of TSU.	15 A. I did.
18 Q. What did you do for Ruby Tuesday?	16 Q. When she got to be mayor, you were 17 brought on to her administration, correct?
19 A. I worked in the kitchen and then worked 20 as a server.	18 A. Yes, ma'am. I was hired on to work for 19 her, yes, ma'am.
21 Q. Was that after you got out of TSU?	20 Q. What was your position?
22 A. If I recall it was in the middle of, 23 maybe a little bit after.	21 A. My position under Megan she brought me in 22 to do equity and work force development and serve as a 23 labor liaison, do a lot of outreach within the 24 community and build structures around equity and 25 inclusion.
24 Q. When did you work for Carrabba's?	
25 A. Probably around the same time, maybe a	

<p style="text-align: right;">Page 50</p> <p>1 Q. Were you working with the union? 2 A. At the time of working for Megan or 3 before? 4 Q. When you were working for Megan Barry, 5 were you working with the union? 6 A. No, ma'am. At the time I was in the 7 mayor's office, I was working for Megan Barry, the 8 mayor, in the mayor's office. 9 Q. Were you dealing with the mayor's office 10 contacting unions, though? 11 A. Yes, ma'am. I was a liaison to the 12 unions from the mayor's office. 13 Q. Is that the main thing you did for Megan 14 Barry? 15 A. That was one of several things I did for 16 Megan Barry. 17 Q. What years did you work for Megan Barry? 18 A. I worked for Megan Barry -- in the 19 mayor's office I worked for Megan Barry from 2015 to 20 the time of her resignation. 21 Q. Which was what year? 22 A. I think 2017, 2018, maybe beginning of 23 2018. 24 Q. Then where did you go to work? 25 A. I stayed working with Metro office under</p>	<p style="text-align: right;">Page 52</p> <p>1 Q. Did you put in the information that is on 2 your LinkedIn page? 3 A. I did some at the time. I had a branding 4 person working with me to help me get that up to par. 5 Q. You made sure it was accurate, correct? 6 A. Yes, ma'am. 7 Q. Is your LinkedIn page accurate? 8 A. I actually haven't been on LinkedIn as 9 much as I was at the beginning, so I would need to go 10 back in. I am pretty sure not much has changed. 11 Q. Do you see where it says experience, 12 Executive Officer for Diversity, Equity, and Inclusion 13 and says June 2020 through present, one year and ten 14 months; is that right? 15 A. Yes, ma'am. 16 Q. Then it says diversity -- diversity I 17 believe, equity and inclusion consultant, Blueprint 18 Solutions Group, LLC, from October 2019 through the 19 present, two years and six months. Are you currently 20 working for Blueprint Solutions Group, LLC? 21 A. Say the last part again. You went out. 22 Q. Are you currently working for Blueprint 23 Solutions Group, LLC? 24 A. Blueprint Solutions Group, LLC, was an 25 entity I started myself. It's not a sole</p>
<p style="text-align: right;">Page 51</p> <p>1 Mayor Briley. 2 Q. How long did you stay there? 3 A. Up until he did not win his election in 4 2019. 5 Q. When did you leave the mayor's office 6 under Briley? 7 A. October 2019 I believe. 8 Q. Then is that when you went to work for 9 Bloomberg? 10 A. About a month or so later, yes, ma'am. 11 Q. Are you currently working any other job? 12 A. Currently, no, right now. 13 Q. Have you worked any other job while you 14 have been at Metro schools? 15 A. No, ma'am. 16 Q. Stop the share. I want to show you 17 something else. Can you see this document that I am 18 showing you right now? 19 A. Yes, ma'am. 20 Q. Do you recognize this guy? 21 A. Yes, ma'am. 22 Q. That's you? 23 A. Yes, ma'am. 24 Q. Is this your LinkedIn page? 25 A. It looks to be.</p>	<p style="text-align: right;">Page 53</p> <p>1 proprietorship, but it's my consulting firm I started, 2 so it doesn't work for anybody, other than Ashford, but 3 because I have been working with the schools, I haven't 4 taken on any other clients outside of working for 5 public schools right now. 6 Q. Does Blueprint Solutions Group still 7 exist? 8 A. It does exist. I was on a call last week 9 and this morning, last week or week before working out 10 some paperwork because they cannot find my entity, and 11 I needed to do that for tax record updates. Yes, I am 12 still here. 13 Q. Do you have any employees? 14 A. I do not. 15 Q. Do you have any contracts? 16 A. I do not. 17 Q. Have you made any income from October 18 2019 through the present date? 19 A. I did. That was one of the reasons I 20 wanted to get all my tax stuff. There was a speaking 21 engagement I had with Educators Cooperative. They 22 wanted to pay me for that. I asked them to put it 23 under my LLC so as not to conflate anything or be on 24 unethical terms with the school district. That was the 25 only thing I have done since then.</p>

<p style="text-align: right;">Page 54</p> <p>1 Q. I am going into this with you. Only 2 income you have had with Blueprint Solutions Group, 3 LLC, from October 2019 to present date was a speaking 4 engagement?</p> <p>5 A. That is not correct. After I finished 6 working with Bloomberg October 2019, until I worked 7 with the schools, I was paid under Blueprint Solutions 8 Group by Bloomberg. The time that I came to work for 9 MNPS in June or July of 2020, I have not taken any 10 clients since then. The one bit of any type of income 11 that I have had it has been in 2021 when I spoke at an 12 engagement with the Educators Cooperative and they paid 13 me for that speaking engagement. Since I left 14 Bloomberg in 2020, that is the only thing I have done 15 under Blueprint Solutions Group.</p> <p>16 Q. Why did you ask the educators who paid 17 you to give a speech to pay you through Diversity, 18 Equity and Inclusion?</p> <p>19 A. Under my consulting firm?</p> <p>20 Q. Yes.</p> <p>21 A. So it would not conflate if there was 22 anything ethically wrong with taking that as a Metro 23 employee because it would have gone under Ashford 24 Hughes and I would have to report it. I said, I have 25 an LLC; I'll do it under my business, and then I can do</p>	<p style="text-align: right;">Page 55</p> <p>1 that every time when taxes are to be filed if you are 2 doing anything that isn't MNPS salary related, that you 3 have to file it. I believe I need to go back and read 4 the full document again, but I try to stay above and 5 make sure I am doing everything ethically correct.</p> <p>6 Q. So do you know why Metro school wants to 7 know whether or not you had outside income?</p> <p>8 A. I cannot speak to that. I do not. I 9 thought it was part of the ethics process.</p> <p>10 Q. Who did you give the speech to?</p> <p>11 A. It was to a group called the Educators 12 Cooperative. They work with teachers giving them 13 particular trainings and get them in front of different 14 groups. I think I was on a panel at the time.</p> <p>15 Q. How much did they pay you?</p> <p>16 A. I think it was a thousand dollars.</p> <p>17 Q. You had them pay your entity so it would 18 not be reported through this document system that HR 19 would send you at Metro schools, correct?</p> <p>20 A. I don't think that's the way I stated it. 21 I had them send it to my LLC, so then I could make 22 certain to report it when it was time to file the 23 report at the end of the year so as not to be in 24 violation of -- to be on the up and up about moneys 25 that I earned that were outside of MNPS. So there was</p>
<p style="text-align: right;">Page 55</p> <p>1 taxes and report it there. You still have to report 2 these things with Metro government.</p> <p>3 Q. If you work for Metro government and give 4 a speech that you get funds in for, you have to report 5 it to Metro government, correct?</p> <p>6 A. Yes. As I know it, if you get any funds, 7 if you take any income in that is not directly coming 8 from your public entity, Metro Public Schools, you have 9 to file that in an upcoming document that we get as we 10 file taxes. I can't think of the name of what the 11 document is, but it asks us all those things.</p> <p>12 Q. So then do you know who provides you with 13 this document?</p> <p>14 A. When I was in the mayor's office, we did 15 them every year around tax time, and ever since I have 16 been here at MNPS, this is a document I believe HR 17 sends to everybody.</p> <p>18 Q. It ask you have you earned any outside 19 income, correct?</p> <p>20 A. That's what I believe the document says, 21 yes, ma'am.</p> <p>22 Q. So if you have to file it and send it 23 back to Metro schools, is it on an annual basis?</p> <p>24 A. I received them twice since I have been 25 here, so I am going on a limb and say, yes, you receive</p>	<p style="text-align: right;">Page 57</p> <p>1 nothing ethically going on that I did not account for.</p> <p>2 Q. You filed a form with MNPS that says, I 3 own a company called Blueprint Solutions Group and they 4 got paid a thousand dollars?</p> <p>5 A. I would need to go back and look at the 6 form again, exactly what the form asks, how I filled it 7 out and all of those things.</p> <p>8 Q. Were you just doing your taxes right now?</p> <p>9 A. Yes, ma'am.</p> <p>10 Q. Did you claim a thousand dollars income 11 for Blueprint Solutions Group?</p> <p>12 A. I will be claiming that, yes, ma'am.</p> <p>13 Q. You haven't claimed it yet, you haven't 14 filed taxes yet?</p> <p>15 A. I have not.</p> <p>16 Q. Do you prepare your own taxes?</p> <p>17 A. No, ma'am. I have a company that does it 18 for me.</p> <p>19 Q. What company does that?</p> <p>20 A. The young lady's name is -- I just had 21 it. Her name is Taneka Givens (phonetic spelling); she 22 is out of Indiana. I would have to find the name for 23 you here in a second.</p> <p>24 Q. If you can find that, let me know. That 25 would be great. Have you filed the form Metro schools</p>

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1 wants you to file?	1 under Blueprint Solutions, LLC, up to the time
2 A. I have not filed anything as of yet,	2 Bloomberg dissolved his campaign. I believe that was
3 because I am still in the process of gathering and	3 in late March. I was paid until April or May, but,
4 getting all my paperwork prepared.	4 again, I would need to go back through the contract and
5 Q. It's pretty simple; you only got a	5 look at all that, but Blueprint Solutions Group was how
6 thousand dollars, correct?	6 I got paid as a contractor, as I said earlier, with
7 A. Yes, ma'am.	7 Michael Bloomberg campaign.
8 Q. Did you get a form from the group that	8 Q. You are correct. Anytime I say something
9 you gave the speech for?	9 wrong you let me know.
10 A. Yes, they sent me something earlier this	10 A. Okay.
11 year.	11 Q. Blueprint Solutions Group had no
12 Q. Was it a W-9 form?	12 employees except for you?
13 A. I believe so.	13 A. That is correct.
14 Q. They sent it to Blueprint Solutions	14 Q. Did Blueprint Solutions Group, LLC, file
15 Group, LLC?	15 its own income tax return?
16 A. Yes, ma'am.	16 A. It was filed within my family income tax
17 Q. The forms that you filed with Metro --	17 information.
18 when are you supposed to file those by?	18 Q. Did it have a separate return, an LLC
19 A. I don't have that date in front of me	19 return?
20 right now.	20 A. No, ma'am.
21 Q. The income was received in 2021, correct?	21 Q. Who was your supervisor at Bloomberg?
22 A. Yes, ma'am.	22 A. My supervisor at Bloomberg was Courtney
23 Q. So then do you know whether or not they	23 Wheeler.
24 sent you the form in 2021?	24 Q. Where was she located?
25 A. If who sent me the form?	25 A. She was located in Nashville.
Page 59	Page 61
1 Q. Metro schools, HR sent you the form?	1 Q. Who does she work for in Nashville?
2 A. Yes, I believe I have that in my	2 A. She has her own consulting firm. I can't
3 documents.	3 remember the name. I think she made changes in between
4 Q. Do you know when in 2021 they sent it to	4 then. I cannot speak to who she is with or the name of
5 you?	5 her company as of right now.
6 A. I do not. I believe the same time I got	6 MS. STEINER: I'd like to mark your
7 my W2 form, maybe around that time, but I cannot recall	7 LinkedIn profile as Exhibit No. 2.
8 off the top of my head.	8 (Exhibit No. 2 was marked.)
9 Q. So then as of today's date, April 11,	9 MR. FOX: No objection.
10 2022, you have not disclosed to Metro schools you got	10 BY MS. STEINER:
11 this thousand dollars?	11 Q. I would like to show you something else.
12 A. I have not filed my paperwork for	12 A. Okay.
13 anything as of right now. That is correct.	13 Q. Do you see this document that's a record
14 Q. From October 2019 through the date that	14 check Nashville, Davidson County, Tennessee, Criminal
15 you got hired on at Metro, Blueprint Solutions made no	15 Court Clerk?
16 income, correct?	16 A. Yes, ma'am.
17 A. Say the last part again.	17 Q. Have you seen this document before today?
18 Q. On the date that you left the mayor's	18 A. I don't believe so.
19 office, October 2019, through the date you applied and	19 Q. That is you, Ashford Rolland Hughes,
20 got hired by Metro schools, Blueprint Solutions Group	20 correct?
21 made no income, correct?	21 A. Yes, ma'am.
22 A. That is false. Earlier I said to you, as	22 Q. Date of birth December 8, 1978?
23 I am on the record saying, when I began working for	23 A. Yes, ma'am.
24 Michael Bloomberg, I began working under a contract. I	24 Q. This shows you were charged with
25 was clear saying I had a contract, and the contract was	25 possession of casual exchange and convicted of that?

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1 A. Having just seen this document today, I 2 would need to look at it and fully go through 3 everything it is to be factually correct in saying yes. 4 Q. It also has the DUI May 25, 2004, and it 5 looks like you were convicted of reckless driving. Do 6 you recall that? 7 A. I believe so. 8 Q. Then on May 25th of 2004, you were also 9 charged with implied consent. Do you recall that? 10 A. I believe those were connected with each 11 other, if I am not mistaken. I would have to go back 12 and look at the document in my hand. It's kind of hard 13 to see on screen, but I can see it. 14 Q. Does that mean the police asked you to 15 blow into the DUI machine and you didn't want to do 16 that? Is that what that is about? 17 A. I can't speak to the legalities. I would 18 need to go back and look at everything. I don't recall 19 everything that took place at that time. 20 Q. Do you see also you were charged with 21 driver's license suspended? Can you tell me what 22 happened to your license then? 23 A. I can't recall. We're talking about 18 24 years ago. I would need to -- I can't recall. 25 Q. Here is the DUI I think you were	1 A. Eventually she did get back in contact 2 with me. 3 Q. Was she helpful? 4 A. I believe she gave me the information 5 that she wanted to give me. 6 Q. Are you implying she did not give you 7 some information? 8 A. She just let me know it was a tough job 9 and it would take at least several years for me to be 10 able to do the job accurately. 11 Q. Did she tell you who to contact if you 12 needed help? 13 A. No, ma'am. 14 Q. Did she list some of the employees that 15 worked there and what their strengths were? 16 A. No, ma'am. 17 Q. Did you have like a 40-minute 18 conversation with her where she explained her job to 19 you? 20 A. I think it may have been 30 or 40 minutes 21 where she was giving me a little bit of insight, yes, 22 ma'am. 23 Q. Who does School Choice now? Who is the 24 main person handling that? 25 A. As we talked about earlier, I supervise
Page 63	Page 65
1 convited of in 2007, correct? 2 A. Yes, ma'am. 3 Q. Then I think the last thing here is 4 weapon, unlawful possession. Do you know why they said 5 you unlawfully possessed it? 6 A. I can't recall. I don't know. I am not 7 an officer to be able to stipulate that. I don't 8 recall. 9 MS. STEINER: Can we have this record 10 marked Exhibit 3 to your deposition? 11 MR. FOX: No objection. 12 (Exhibit No. 3 was marked.) 13 BY MS. STEINER: 14 Q. Mr. Hughes, when you applied did anyone 15 ask you anything about Blueprint Solutions and what you 16 did for Blueprint? 17 A. Not that I recall. 18 Q. Do you know my client, Jane Doe? 19 A. I do not. 20 Q. Have you ever had any dealings with Jane 21 Doe that you recall? 22 A. I recall potentially reaching out as 23 introduction and to get insight into the office and 24 team she had managed. 25 Q. Did Jane Doe help you?	1 the team of three full-time employees and one part-time 2 employee. I do that in partnership. 3 Q. What else do you do for Metro schools? 4 A. I serve as the Executive Officer for 5 Diversity, Equity, and Inclusion. I work directly to 6 support some of the schools with going in and reading 7 to young boys and girls and anything else that I am 8 asked to do. 9 Q. You said you support the schools by going 10 in to read. You mean you personally go in and read to 11 them? 12 A. Absolutely. 13 Q. Anything else you do as Executive Officer 14 of Diversity, Equity, and Inclusion? 15 A. I supervise two of our equity coaches we 16 have right now. I make certain right now on the DE&I 17 that we have cultivated and developed an equity road 18 map. We work with our educators to make certain we 19 provide planning and training for them on the pedagogy 20 of how to increase equity within schools. 21 I worked with various departments to make 22 certain that equity is living within their department. 23 I work closely with all of our chiefs looking at 24 different programmatic work that can have equity lenses 25 administered to them.

Page 66 <p>1 I go in and have at least two schools that 2 I regularly support, whether it's to come in and help 3 in classrooms, whether it's just to be there, to do 4 work there and help them connect with students, as well 5 as I support many other schools, as I said earlier, by 6 going in and reading, doing different type of 7 enrichment, particularly with some of the young men we 8 have in schools.</p> <p>9 I work as a liaison, work with some of 10 our HVCUs in some of our faith communities and black 11 and brown communities to make sure they are aware of 12 things. I do a plethora of things for Metro public 13 schools right now.</p> <p>14 Q. Let's talk about last week. What was on 15 the calendar?</p> <p>16 A. Last week? Is that what you said?</p> <p>17 Q. Yes.</p> <p>18 A. Last week -- I mean like every week we 19 make certain we are finalizing the lottery of placement 20 to make sure that every -- on the School Choice side 21 making certain every family has what they needed. 22 We're partnering with a department to make certain the 23 Promising Scholars program is run well and that we're 24 reaching out to families on that side of things to make 25 certain that everybody is registering for Promising</p>	Page 68 <p>1 team every Tuesday and Thursday. We had meetings with 2 the Promising Scholars team and others that were part 3 of that process, several meetings with that throughout 4 the week to get families as our deadline is upcoming.</p> <p>5 Q. Is it a fair statement you don't pick 6 kids to go to Metro schools, that the families pick 7 you?</p> <p>8 A. Repeat that. You went in and out.</p> <p>9 Q. You do not pick the kids who attend Metro 10 schools, their parents make the decision to allow their 11 kids to attend Metro schools?</p> <p>12 A. I believe that's an accurate statement.</p> <p>13 Q. That's not accurate?</p> <p>14 A. I said I believe that's an accurate 15 statement.</p> <p>16 Q. You do not?</p> <p>17 A. I do. I do believe it's an accurate 18 statement.</p> <p>19 Q. So then with regard to Diversity, Equity 20 and Inclusion, with regard to the students, you can go 21 out and recruit minority students, correct? It's not 22 like a private school?</p> <p>23 A. I am not certain what that has to do with 24 Diversity, Equity and Inclusion me going to pick the 25 students.</p>
Page 67 <p>1 Scholars and that they have all the information that is 2 needed to accurately get their kid into our summer 3 program.</p> <p>4 On the equity side of things, was working 5 with various groups, various stakeholders internally 6 and externally focused on upcoming summer training for 7 teachers and educators in support of finalizing some 8 work with our partners on the equity road map and 9 looking at other partnerships we have going on to make 10 certain we have specific measures in place to show 11 growth and progress.</p> <p>12 Q. Who did you talk to to show growth and 13 progress last week? Who did you talk to?</p> <p>14 A. I had my one on one meeting with Dr. 15 Battle last week. We had my meeting -- several 16 meetings with leaders in the professional learning 17 spectrum and our chief of schools. I meet with my 18 equity coaches in a formalized meeting every Tuesday 19 morning to map that out.</p> <p>20 I met with our chief of schools. We are 21 partnered with an entity working on the teaching job. 22 We met for three hours one day last week going over 23 that process. I could continue on. I would have to 24 look at my calendar. That's on the equity side.</p> <p>25 On the school option side, I meet with my</p>	Page 69 <p>1 Q. Meaning the Diversity, Equity and 2 Inclusion isn't really something that concerns the 3 student so much as it does the employees? Am I right 4 on that or wrong?</p> <p>5 A. I would say you are wrong on that. DEI 6 work is not -- DEI work encompasses a lot, but it does 7 impact the student.</p> <p>8 Q. DEI work -- that's an acronym you use for 9 that, correct?</p> <p>10 A. That's instead of saying Diversity, 11 Equity and Inclusion every time, yes, DEI is the 12 acronym.</p> <p>13 Q. That's much easier. You are not a 14 teacher, correct?</p> <p>15 A. That is correct.</p> <p>16 Q. You are not certificated?</p> <p>17 A. That is correct.</p> <p>18 Q. With regard to the students, what is it 19 that you are doing?</p> <p>20 A. So when it comes to -- you mean as far as 21 -- let me make sure I answer the question clearly. 22 What am I doing as far as Diversity, Equity and 23 Inclusion?</p> <p>24 Q. DEI.</p> <p>25 A. Couple of things. One, I am not</p>

<p style="text-align: right;">Page 70</p> <p>1 connected directly to the students in that space. I am 2 not a direct advocate. I am five steps away. What I 3 do from the Diversity, Equity and Inclusion side is to 4 make certain I make the conditions by which every 5 student has what they need to be successful. That 6 means not just looking at just outcomes but processes 7 we have in place to increase to make certain those 8 students with the most needs right now get what they 9 need.</p> <p>10 When it comes to directly aligning with 11 students and getting teachers to align with students, 12 we are working in our work to make certain we have 13 frameworks in place to cultivate student voice in all 14 that we do, the same frameworks we work to cultivate 15 family voice so we have key partnerships between our 16 educators in the classroom and in the building directly 17 connected with our students so that students can feel 18 engaged with their identities or values. I help to 19 create the conditions by which those things can take 20 place for our students and they can benefit from those 21 conditions. They have agencies to tell what they need 22 to get to those conditions.</p> <p>23 Q. Was this in place before you took over? 24 Was any of this in place before you took over at Metro 25 schools?</p>	<p style="text-align: right;">Page 72</p> <p>1 would have to go back and look at that whatever the 2 costs for FTEs were. It is a conversation that I 3 talked about, hey, this is what we could be to continue 4 to move the needle on our early equity journey.</p> <p>5 Q. Did anyone tell you that there is no 6 funds available for --</p> <p>7 A. I haven't gotten knee deep in the full 8 conversation about that. Nobody has told me that I can 9 recall absolutely no or where we are going.</p> <p>10 Q. Who do you report to?</p> <p>11 A. I directly report to Hank Clay.</p> <p>12 Q. Who does Mr. Clay report to?</p> <p>13 A. I believe Hank reports directly to Dr. 14 Battle.</p> <p>15 Q. Your background in Diversity, Equity and 16 Inclusion, did you handle this at any point before you 17 went to Mayor Megan Barry's office?</p> <p>18 A. Yes.</p> <p>19 Q. Where?</p> <p>20 A. I mean my entire career has been in 21 Diversity, Equity and Inclusion. It is just because of 22 recently that we have these names around it. As I was 23 serving as political director for the Tennessee 24 democratic party, what I was working on was Diversity, 25 Equity and Inclusion. As I was working as the first</p>
<p style="text-align: right;">Page 71</p> <p>1 A. I can't speak to that. I have been 2 cultivating this from my knowledge in building systems 3 in previous organizations. I cannot say everything I 4 am working toward right now or that the district is 5 working toward was in place before I got here as far as 6 Diversity, Equity and Inclusion. I do not believe 7 there was an office situated here.</p> <p>8 Q. Did anyone recently ask for major funding 9 for your office, a little over a million dollars?</p> <p>10 A. Have I asked for major funding?</p> <p>11 Q. Has anybody asked for major funding for 12 your office?</p> <p>13 A. There are always multiple groups going 14 out. We have several that are coming to speak this 15 week I believe that are always asking for more funding 16 to work on Diversity, Equity and Inclusion goals.</p> <p>17 Q. I heard that your department is asking 18 for almost 1.5 million in additional funding so you can 19 hire more staff for your department. Am I right on 20 that?</p> <p>21 A. For my department we've asked or what I 22 made notice of as we went through a particular budget 23 process for us to get to where we might want to be 24 these are some things we will need going down the line. 25 I don't recall it being over a million dollars. I</p>	<p style="text-align: right;">Page 73</p> <p>1 person to get hired on on a congressional race in South 2 Carolina as political director and the field director, 3 we were working on elements of Diversity, Equity and 4 Inclusion, and I can date it back to my time working 5 for the TNPD in my early years working with Harold 6 Ford, Jr. and others working on the concepts and 7 practices of the DE&I work. Then I can equate it to 8 the work I was doing when I was working with my labor 9 union. I was a political and labor organizer in 10 multiple states.</p> <p>11 Q. It didn't have anything to do with 12 schools, though, correct?</p> <p>13 A. You said those other jobs did not have 14 anything --</p> <p>15 Q. To do with schools?</p> <p>16 A. At the time I did not have any 17 interaction with Metro schools at the time outside of 18 the mayor's office when I worked with the education 19 liaison at the time.</p> <p>20 Q. When you worked on the Bloomberg campaign 21 and all these political campaigns, correct me if I am 22 wrong, but seems like to me that would be in terms of 23 trying to get minorities to come in to vote and join 24 the democratic party? That's the goal, correct?</p> <p>25 A. That is incorrect. I am going to push</p>

<p style="text-align: right;">Page 74</p> <p>1 back on saying the word minorities. Minorities has a 2 negative connotation. What I was working on with 3 Harold Ford, Jr., and others was not just to come vote 4 or join the democratic party. One was how do we 5 engage, involve and empower our communities to know the 6 information and then to use the information to utilize 7 our voices to express what we need as a community and 8 not just with Harold Ford and some of the other places, 9 not every time that I worked with the democratic party 10 has it been on electoral policies only. Some have been 11 organizing and galvanizing the community to understand 12 what's available for them and how do we work together 13 to get what we need.</p> <p>14 Q. Harold Ford -- correct me if I am wrong 15 because I can't really remember -- did he not have some 16 scandal that caused him to leave office?</p> <p>17 A. Harold Ford, Jr.? I can't speak to that. 18 Harold Ford, Jr. left office because he did not win the 19 election for U.S. Senate.</p> <p>20 Q. Was there some allegation, though?</p> <p>21 A. Not that I recall for Harold Ford, Jr.</p> <p>22 Q. What happened to Harold Ford, Sr.?</p> <p>23 A. I am not familiar with his father. I 24 worked for Harold Ford, Jr. I know a little about his 25 father. His father was a congressman decades ago.</p>	<p style="text-align: right;">Page 76</p> <p>1 and you were going to have to take those job duties? 2 A. That's very specific. No, I do not 3 remember anybody telling me that at all.</p> <p>4 Q. It's my understanding it actually came as 5 a bit of a surprise to you, correct?</p> <p>6 A. It depends on -- surprise, I am not sure 7 I can calculate that. I don't recall exactly how the 8 conversation went. If that's an added duty, I will 9 take it with stride, keep it moving and get the work 10 done.</p> <p>11 Q. It was an added duty for you, correct?</p> <p>12 A. Again, I will take it -- you know, I 13 don't think I -- the premise of the question was it an 14 added duty, I never -- the majority of my job, 15 particularly around DE&I encompasses a lot. There 16 isn't just one thing I do. I can't say I took it as a 17 surprise in that nature. DE&I work is not just one 18 specific thing you do and you are done with it. It 19 encompasses a lot. I don't think people understand.</p> <p>20 Q. Does it encompass things such as teaching 21 a class about how to make a slave? Is that something 22 your department would have been looking into and 23 concerned about?</p> <p>24 A. Let me make sure I heard the question. 25 Would my office be making an effort to have a lesson on</p>
<p style="text-align: right;">Page 75</p> <p>1 Q. I will show you something else. I am 2 getting almost to the end. Do you recall any cases 3 against you by a company called Cash something or 4 another, Cash One?</p> <p>5 A. Not that I can recall off the top of my 6 head.</p> <p>7 Q. Do you recall being sued in general 8 sessions for, like, a loan shark, a pawn company or 9 someplace you go to get cash?</p> <p>10 A. Not that I can recall.</p> <p>11 Q. I may have asked you this. Do you know 12 how long your interviews lasted?</p> <p>13 A. I cannot recall.</p> <p>14 Q. Did you know Dr. Battle before you went 15 to work for Metro schools?</p> <p>16 A. I did not know Dr. Battle, not in any 17 type of professional way. I didn't.</p> <p>18 Q. When you first interviewed for this 19 position, was it your understanding that it would have 20 anything at all to do with School Choice?</p> <p>21 A. I don't recall. Again, it was two years 22 ago. I can't recall.</p> <p>23 Q. Do you recall anyone telling you when you 24 were interviewing for the position that they were 25 eliminating the position of director of School Choice</p>	<p style="text-align: right;">Page 77</p> <p>1 how to become a slave?</p> <p>2 Q. No, no. The question is different. If 3 Metro schools was teaching a class called How to Make a 4 Slave, is that something that your department would 5 step in to oversee?</p> <p>6 A. I think it would be my department along 7 with the -- I think a new department was formed, civil 8 rights division, I believe our chief of academics would 9 all take into that to figure out what's going on 10 because nothing happens in a silo. Those are the two 11 departments that come off the top of my head that would 12 be in that type of conversation if that type of lesson 13 plan was going on.</p> <p>14 Q. Were you aware that Metro schools made 15 national news because of a lesson taught at Waverly 16 Belmont called How to Make a Slave?</p> <p>17 A. I do not remember that. If I have seen 18 it, I haven't kept it in my memory bank recollection to 19 bring it up. I do not.</p> <p>20 Q. Mr. Hughes, assuming that it took place 21 before you were actually hired on at Metro schools, 22 assuming it took place in January of the year you were 23 hired, do you think someone at Metro schools should 24 have told you there was an issue with regard to 25 diversity, DEI, because this lesson was taught called</p>

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1 How to Make a Slave? 2 A. I can't speak for what they should have 3 told me or what I believe they should have told me. I 4 don't think I had that conversation. I am not sure 5 what the should have, could have, would have would 6 actually look like. I am not certain that -- I don't 7 believe it came up, but I am not sure how that would 8 come up. I can't answer. I can't give you a quality 9 answer for that question. 10 Q. The question is a little different. You 11 are executive director for DE&I at Metro schools? 12 A. Correct. 13 Q. If something like that occurred now, you 14 need to be made aware of it, correct? 15 A. I would believe I would be one of several 16 people to be made aware of it. 17 Q. If something like that happened that was 18 so bad it made national news several months before you 19 were hired on, should you have been told about it in 20 your opinion, not anybody else's, but in your opinion? 21 Should you have been told about it? 22 A. I think I will be very clear outlining 23 what my opinion is. You asked me under oath and I want 24 to speak to facts. I cannot speak to facts what should 25 have been told or shouldn't have been. I don't have a	1 A. I do not believe I had that conversation 2 with anybody. I know that's not a national story that 3 comes to my mind. I know recently I've seen other 4 states that have gone through that, but I don't recall 5 Nashville, per se, during that time. 6 Q. Let me make sure I understand what you 7 are saying for the record. Don't let me cut you off. 8 Stop me if I do. Very short on this. You were not 9 made aware of that lesson, and as the executive officer 10 of DEI at Metro schools, you do not believe you should 11 have been made aware of that lesson, correct? 12 A. Definitely not correct. I did not say I 13 shouldn't have been. I am telling you I did not have 14 that information. I can't give you right now would 15 that have been important right then to say this is 16 something that needs to go -- and you are asking in my 17 interview process or when I am coming to be hired on? 18 Q. When you took over the position of DEI 19 executive officer. Okay? All I am asking you is this 20 something you think you should have been told about? 21 Do you think as the executive officer of DEI you should 22 have been told that there was an issue with regard to a 23 student teacher teaching a class called Let's Make a 24 Slave? 25 A. I would definitely again go back and make
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1 good answer for that question. I can only deal with 2 the facts, not my opinion or what I think or hope to 3 believe. 4 Q. Mr. Hughes, you have been very, very -- I 5 appreciate you being here today. I know depositions 6 aren't the easiest thing, but I can ask you your 7 opinion. You are the head of the department at Metro 8 schools. What is your opinion? Should this have been 9 brought to your attention when you stepped on at Metro 10 schools? 11 A. When did you say this report came out? 12 Q. Late January of 2020 and you were hired 13 on within a few months. 14 A. Again, I can't speak to -- I don't know 15 much about the case what went on, was it the right time 16 or wasn't the right time. I do know I came in at the 17 height of COVID and there was a lot going on at that 18 time. So I don't know what was in the mind of others 19 at that time as well. I can't speak to that. I don't 20 believe having that conversation -- I'm not sure it 21 would have guided the work I am doing right now if I 22 had been informed of that or if I hadn't. 23 Q. You were not informed of the Let's Make a 24 Slave lesson and you are not sure you even should have 25 been informed of it?	1 certain I would have all the context that you are 2 saying right now. I don't want to say yes based off 3 what I feel or think -- let me understand what you are 4 really asking me in this question. I am not trying to 5 be -- 6 Q. Let's go back and show you what was 7 taught and ask you should you have been made aware of 8 this. Can you see this, what I put up here, the 9 writing I put on the board? It says Jane Doe versus 10 Metropolitan Government of Nashville, Davidson County, 11 Tennessee and Dr. Adrian Battle. You see that? 12 A. I can. 13 Q. This is my client's complaint she filed. 14 We put in the paragraphs from the lesson that was given 15 to the children at Waverly Belmont. Read paragraph 4. 16 Tell me when you have the stuff on the screen read and 17 I will move down for you. 18 A. Start from line 14 on down? 19 Q. Yeah. Read this. 20 A. Okay. 21 Q. I will go down. 22 A. You went up a little quick. Okay. 23 Q. Were you familiar with this thing called 24 the Willie Lynch letter? 25 A. I am familiar with that.

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1 Q. Do you agree that this is -- what we put 2 in the complaint is dehumanized racial degradation? 3 Would you agree with that?	1 week, absolutely. We would be working with our other 2 departments to figure out, hey, what is taking place, 3 do our teachers have cultural competency to know when 4 and what to teach, how to teach it, what's responsible 5 and what's not responsible. We would have a kind of 6 what we do for students that need intervention and 7 help. We would try to work with the school to put 8 things in place to make certain the conditions are just 9 and equitable for all students and that we take into 10 consideration the teaching modules and understanding 11 social and emotional learning, all those things.
4 A. The Willie Lynch letter or the narrative 5 here Let's Make a Slave?	12 Q. Did you know that Jane Doe's son was in 13 this class?
6 Q. The narrative.	14 A. I did not. I do now.
7 A. I mean it's tough. Is this an excerpt 8 from the Willie Lynch letter?	15 Q. Did you know her son suffers from 16 autistic?
9 Q. Yes.	17 A. I do not. I did not.
10 A. You are telling me this was used as a 11 lesson plan?	18 Q. Did you know that Jane Doe's son -- did 19 you know that Jane Doe complained about this lesson and 20 said it was a violation of Title 6?
12 Q. Yes. Mr. Hughes, my question to you is 13 this: You are stepping in to this executive officer 14 position at Metro schools of DEI and this Willie Lynch 15 narrative was just taught to some children that were at 16 Waverly Belmont in late January 2020. Would you have 17 wanted to know about this so you could have stopped 18 this from occurring?	21 A. I did not and do not.
19 A. Would it have helped me coming in to know 20 some of the things that were taking place? Would it 21 have been beneficial to say also this is going on? 22 Would it have been beneficial to know this was an 23 incident that had taken place in the schools? Possibly 24 so, yes, it would have been helpful to say this leads 25 to some of the issues we've had with some lessons	22 Q. Did you know that within weeks of her 23 complaint about that she lost her job as director of 24 School Choice?
Page 83	25 A. I did not and do not.
1 planned, but it wouldn't -- it would have been helpful 2 to know who else was in other areas to help me break 3 down what's actually going on.	Page 85
4 A lot of things have a lot of context to 5 them. Thank you for sharing it. This is my first time 6 even reading this as part of a lawsuit to know what was 7 going on. Waverly Belmont is elementary, so I am 8 thinking of the grades that were in there. So it would 9 have been some insight for me to know what was going on 10 to say this is an incident we have, we're working to be 11 better as a school district.	1 Q. Did anyone from Metro, not Metro legal, 2 but anyone from Metro contact you to find out exactly 3 how you came about to be hired as the executive officer 4 of DEI?
12 Q. So the first time you have even read what 13 was taught at Waverly Belmont is today in your 14 deposition?	5 A. Has anybody at Metro public schools asked 6 me how I came to be hired for this role? Not that I 7 can recall. I mean not how did you get this job or -- 8 not that I recall, no.
15 A. Yes.	9 Q. Have you heard anyone at Metro -- you may 10 or may not, but have you heard anyone make comments 11 about how Jane Doe cannot be hired into any particular 12 position because she has a lawsuit against the 13 district?
16 Q. Would you agree with me this was not 17 appropriate for those children?	14 A. I have not heard that. Personally I have 15 not heard that.
18 A. For that grade without any context, I 19 probably wouldn't recommend it for that grade if I am 20 in a mentorship organization or in schools.	16 Q. Do you oversee any of the -- do you make 17 recommendations to any of the principals, make 18 recommendations to any of the teachers about what to 19 teach in the classes?
21 Q. If you were to find out that a teacher 22 taught this class last week, would you have set up 23 something in your office to try to prevent it from 24 happening in the future?	20 A. Do I make recommendations to the teachers 21 about what to teach in the class?
25 A. I think if I found it happening last	22 Q. To the principals, to the teachers that 23 goes down through the line about what should be taught 24 in the classes?
	25 A. Not to that extent what to be taught, no,

<p style="text-align: right;">Page 86</p> <p>1 ma'am.</p> <p>2 Q. So if you are not recommending what's to 3 be taught, are you recommending what type emotional 4 services to provide or counseling services?</p> <p>5 A. Let me tell you what I do to get all the 6 disbelief and you don't have to ask me multiple 7 questions. This is what I do provide for teachers in 8 this phase. We work with teachers to make certain they 9 understand foundational core elements of what equity 10 looks like in school buildings and school rooms. We 11 work with them to know that equity is not the goal. It 12 is the vehicle by which we achieve our goals. We work 13 with them to fully look and be reflective on their 14 practices, their pedagogical practices in efforts to 15 respect identity, respect the cultural wealth and 16 assets of students. I work with our curriculum and 17 instruction team to make certain that with the social 18 studies team that we are using inclusive, diverse 19 lesson planning, that all of their coaches and 20 instructors go through DEI training, that they 21 understand how everything links with our road map and 22 how we are working to make certain that we -- as we 23 talk about every student knowing what that looks like, 24 how do we go about doing that, but I do not prescribe 25 to any building director the lesson plans as to which</p>	<p style="text-align: right;">Page 88</p> <p>1 Q. Do you know what year you would have 2 created this resume?</p> <p>3 A. Probably restructured around 2019 or 4 2020.</p> <p>5 Q. Does this show you were working for the 6 mayor's office in 2015 to 2018?</p> <p>7 A. To 2019.</p> <p>8 Q. Does this say 2015 to 2018?</p> <p>9 A. Yeah. That looks to be a mistake, yeah.</p> <p>10 Q. Here up above it says office of the mayor 11 2015 to present?</p> <p>12 A. Okay.</p> <p>13 Q. Jobs for the mayor's office --</p> <p>14 A. No, no. Yeah, there was a point in time 15 within the mayor's office that Mayor Briley appointed 16 me to the chief Diversity, Equity and Inclusion officer 17 title within itself again after we had gone through a 18 study partnership.</p> <p>19 Q. So that occurred in the Briley 20 administration?</p> <p>21 A. It did.</p> <p>22 Q. Did you have any discussions with Mayor 23 Cooper about staying with that administration?</p> <p>24 A. I did not.</p> <p>25 MS. STEINER: Let's have your resume</p>
<p style="text-align: right;">Page 87</p> <p>1 they can and cannot teach.</p> <p>2 Q. Mr. Hughes, what is your current salary?</p> <p>3 A. I want to say, if I am thinking right 4 now, 147.</p> <p>5 Q. Was it higher than that when you first 6 got started?</p> <p>7 A. No, ma'am.</p> <p>8 Q. It's always been 147?</p> <p>9 A. No. I think it was a little bit lower 10 than that.</p> <p>11 MS. STEINER: That is all the questions I 12 have. I appreciate your patience.</p> <p>13 MS. HARBISON: Dr. Hughes, I think I have 14 just a few questions. Can we take a five minute break 15 before we get into --</p> <p>16 THE WITNESS: Yeah. I want to correct 17 the record as well. I am not a doctor. I never said I 18 am a doctor.</p> <p>19 MS. HARBISON: Sorry. That's my bad. 20 (A break was taken.)</p> <p>21 BY MS. STEINER:</p> <p>22 Q. One more question. Mr. Hughes, do you 23 recognize this document I am showing you?</p> <p>24 A. Scroll up. Yeah, probably looks to be a 25 resume.</p>	<p style="text-align: right;">Page 89</p> <p>1 marked next numbered exhibit.</p> <p>2 MR. FOX: No objection.</p> <p>3 (Exhibit No. 4 was marked.)</p> <p>4 * * * * *</p> <p>5 EXAMINATION</p> <p>6 BY MS. HARBISON:</p> <p>7 Q. I have a few questions. My name is Jesse 8 Harbison. I represent Dr. Damon Cathey in this case. 9 Would you have had the option to stay with the mayor's 10 office if you had wanted to?</p> <p>11 A. I am going to answer that question best I 12 know it. Probably not. Probably not.</p> <p>13 Q. Why not?</p> <p>14 A. Two different mayors, different -- I 15 believe this mayor didn't believe in some of the work 16 we were doing and wanted to go his own direction. I 17 believe, like many in the office, it was amicable to 18 keep moving forward in other opportunities.</p> <p>19 Q. Tell me more about what you mean by the 20 mayor not being aligned with some of your beliefs. I 21 believe that's what you said.</p> <p>22 A. No, I think it was different.</p> <p>23 Q. Tell me what I got wrong.</p> <p>24 A. It came from two mayors really focused on 25 DE&I work, diversity, equity, how we are getting in the</p>

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<p>1 communities and I believe -- I am not fully certain 2 everything this mayor wanted to do, but I believe he 3 wanted to go his own direction, not just follow with 4 what the past two mayors had been working on 5 previously.</p> <p>6 Q. What direction was that?</p> <p>7 A. I don't fully know. I haven't fully 8 vetted or gone all the way with the mayor to figure out 9 which direction he fully wanted to go. It was obvious 10 that the DE&I space within my role wasn't -- or with a 11 lot of roles in the administration wasn't where he 12 wanted to go. He wanted to come in and make his own 13 footing as mayor, not just follow up on the work we 14 began with Mayor Barry and Mayor Briley.</p> <p>15 Q. Why was that obvious to you? What 16 happened that made that obvious to you?</p> <p>17 A. The election, going through the campaign. 18 It was definitely obvious that he was going to go in a 19 different direction than many of the staff that were 20 already in there. For the most part, when a mayor 21 comes in, they bring in the people as they go through 22 their vetting process as they build up their team to 23 identify who they want to come into the office. For 24 the most part they bring their own teams with them to 25 be in alignment with their vision.</p>	<p>1 Q. You haven't engaged in any socialization 2 with anyone in two years?</p> <p>3 A. Not a lot, not outside of work and 4 mentorship organization. It's definitely not been the 5 same as prior to COVID because I have two small 6 children.</p> <p>7 Q. You said something earlier about your LLC 8 and the person helping you with taxes -- tell me if I 9 am wrong about this -- something about you can't find 10 where the LLC is; is that correct?</p> <p>11 A. No. My tax person's name is Taneka 12 Jackson (phonetic spelling). As I was calling to get 13 my taxes uploaded, I know that I was in a crew where I 14 owed my filing fee for at least this past year and was 15 going through the process of taking care of that. And 16 as I was talking with the state, they said they could 17 not find my control number. I had to send paperwork 18 and information in to them. I am waiting to hear back.</p> <p>19 Q. Where do you believe your LLC is 20 registered, in what state?</p> <p>21 A. Only state I am registered in is 22 Tennessee.</p> <p>23 Q. What paperwork did you send to the state 24 after you learned they could not find your control 25 number?</p>
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<p>1 Q. Did you know Freda Player-Peters before 2 you began working for MNPS?</p> <p>3 A. Yes.</p> <p>4 Q. How did you know her?</p> <p>5 A. I've known Freda in my time working with 6 the democratic party, working with the labor unions 7 throughout the years.</p> <p>8 Q. About how long have you known her?</p> <p>9 A. I have known Freda since about 2005, 10 2006.</p> <p>11 Q. Did you talk to her about coming to work 12 for MNPS?</p> <p>13 A. I don't fully recall. I value Freda's 14 opinion, so I might have asked her thoughts about it, 15 but I don't fully recall a full vetted out 16 conversation.</p> <p>17 Q. She was on the school board when you 18 applied for the job that you currently hold, correct?</p> <p>19 A. I believe so.</p> <p>20 Q. Do you socialize with Freda 21 Player-Peters?</p> <p>22 A. I haven't socialized with anyone over the 23 last two years because of COVID. In the past we have 24 been definitely friends and socialized and engaged in 25 organizing, so definitely so.</p>	<p>1 A. It was documentation from the secretary 2 of state's office that had my control number, that had 3 all my information, LLC, address, things of that 4 nature.</p> <p>5 Q. Are you familiar with the fact that the 6 board promulgates certain personnel policies for MNPS 7 employees?</p> <p>8 A. Not fully. Some, but not fully.</p> <p>9 Q. So would it follow logically that you are 10 not familiar with conflict of interest policies 11 promulgated by the board for MNPS employees?</p> <p>12 A. I think I know it vaguely but not well 13 enough to sit here and spit it out to you verbatim or 14 in a good framework.</p> <p>15 MS. HARBISON: Those are all my questions. 16 Thank you.</p> <p style="text-align: center;">* * * * *</p> <p>18 FURTHER EXAMINATION</p> <p>19 BY MS. STEINER:</p> <p>20 Q. Can I ask a couple more. Mr. Hughes, for 21 your LLC do you have an EIN number?</p> <p>22 A. I do have an EIN number.</p> <p>23 Q. When did you get the EIN number?</p> <p>24 A. I got the EIN number 2019, end of 2019, 25 2020.</p>

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1 Q. Did you say then your LLC was a limited
2 liability company then?

3 A. I did.

4 Q. When you entered into the contract with
5 Bloomberg, did you say it was an LLC?

6 A. I did.

7 Q. You have an EIN number, you had one for
8 the entity ever since it's been created, correct?

9 A. That is correct.

10 Q. So the income comes to the Blueprint
11 Solutions, as opposed to you personally, correct?

12 A. The only income that has come to me since
13 ending with Bloomberg was a \$1,000, what do you call
14 it, honorarium for being on a panel speaking with the
15 Educators Cooperative.

16 MS. STEINER: That's it. Thank you.

17 MR. FOX: Nothing from me.

18 (DEPOSITION CONCLUDED.)

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1 REPORTER'S CERTIFICATE

2 STATE OF TENNESSEE)

3 COUNTY OF DAVIDSON)

4 I, Cristi G. Watson, Licensed Court Reporter in and
5 for the State of Tennessee, do hereby certify that the
6 foregoing proceedings were stenographically reported by me on
7 the 11th day of April, 2022, and that the foregoing transcript
8 constitutes a true and accurate record to the best of my
9 ability.

10 I further certify that I am not related to nor an
11 employee of counsel or any of the parties to the action, nor
12 am I in any way financially interested in the outcome of this
13 case.

14 I further certify that I am duly licensed by the
15 Tennessee Board of Court Reporting as a Licensed Court
16 Reporter as evidenced by the LCR number and expiration date
17 following my name below.

18 IN WITNESS WHEREOF, I have hereunto set my official
19 hand on this 24th day of April, 2022.

20
21 Cristi G. Watson

22 CRISTI G. WATSON

23 Tennessee License No. 187

24

25

Briggs & Associates 615/482-0037

Nashville, Tennessee

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